

Ackerman, Mark

From: Ackerman, Mark
Sent: Friday, August 16, 2013 2:58 PM
To: chess@idem.IN.gov; sjordan@idem.in.gov
Cc: Kuefler, Patrick
Subject: Comments on ING490000 Sand and Gravel General Permit

Catherine, Sheri,

I reviewed the draft permit and fact sheet for ING490000 (Sand and Gravel General Permit) based on prior comments provided, and the following regulations regarding fact sheets, general permits, and effluent limitations:

40 CFR 124.8-Fact Sheet
40 CFR 124.56-Fact Sheets
40 CFR 122.28-General Permits
40 CFR 122.45-Calculating NPDES permit conditions

Following are some comments on the fact sheet and permit. Please contact me if you have any questions.

1. Fact sheet Section E. Suggest acknowledging that in addition to the eligibility criteria in Section A, to be eligible for permit coverage applicants must also not be precluded from coverage due to the exclusions in Section D.
2. 124.8(b)(2) requires that the fact sheet include the type and quantity of wastes, fluids, or pollutants which are proposed to be or are being treated, stored, disposed of, injected, emitted, or discharged. The fact sheet identifies the type of waste (wastewater from sedimentation treatment basins from sand, gravel, dimension stone, and crushed stone operations), but does not quantify the amount. Please revise the fact sheet to include the low/high range of flows that are representative of these types of discharges.
3. 40 CFR 122.45(d)(1) requires effluent limitations for continuous discharges be expressed as maximum daily, and monthly average. The effluent limit for TSS is expressed as a weekly average. Please revise the TSS limit to be consistent with the 40 CFR 122.45(d)(1) requirement. If the TSS limit was set based on the discharge not being a "continuous discharge" as that term is defined in 40 CFR 122.2, we suggest revising the fact sheet to include justification describing why the limit was set as a weekly average instead of a daily max and monthly average.

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